

February 13, 2014

Mr. Nelson Olavarria
Director Environmental Assessment & Remediation
Cooper Industries
600 Travis, Suite 5600
PO Box 4446
Houston, Texas 77210

RE: 100% Design and Response to NYSDEC Comments dated January 28, 2014 on the 95% Design, Crouse-Hinds Landfills (Site No. 7-34-004)

Dear Nelson,

Below is our response to NYSDEC's January 28, 2014 letter providing comments on the 95% Design Submittal. NYSDEC's comments are provided in bold text followed by our responses in un-bolded text. The revised 100% Design Documents are attached.

1. **Applicable figures should be updated based upon the comments sent by the City of Syracuse.**
Affected Sheets 7A, 7B, 11, and 13 have been updated and are included in the attachments to this letter.
2. **The SWPPP should be updated based upon the comments sent by the City of Syracuse.**
The SWPPP has been updated based on the comments sent by the City of Syracuse and is attached to this letter.
3. **The schedule should be updated as applicable and included in the main text of the document as a separate section.**
The schedule has been updated and is included in the main text of the document as a separate section.
4. **Figure 6A — It appears that the table should include a line for TP-90.**
The cell containing TP-90 on Sheet 6A was excavated and the material sent to an off-site landfill as part of the 2012 Source Removal project. The fill material now in cell TP-90 is imported clean fill and does not require removal as part of the landfill reconstruction. Sheet 6A has been updated to include this information and is included in the attachments to this letter.
5. **Figures 6B & 7B — These figures should be updated (volumes, etc.) based on the 2013 TSCA removal work conducted.**
Sheets (Figures) 6B and 7B have been updated with the 2013 PCB TSCA removal areas mapped and the table volumes adjusted. The updated sheets are included in the attachments to this letter.

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- 6. A cross-section detail should be added to the appropriate figure in order to depict the property boundary for the west wetland adjacent to the North Landfill.**

A cross section detail and a location-in-plan have been added to Sheet 7B to depict the property boundary straw bale barrier along the west wetland adjacent to the North Landfill.

- 7. Appendix F — General backfill specifications should be added. The backfill requirements should be consistent with the ROD language and DER-10, Appendix 5.**

The ROD language and DER, Appendix 5 backfill requirements have been added to the appropriate specification sections as follows:

Section 31180 Earthwork – paragraph 1.2D plus the Appendix 5 Table added at the end of the section

Section 31190 Gas Venting Layer – paragraph 1.2D

Section 31230 Trenching and Backfilling – paragraph 1.2D

Section 31360 Barrier Protection Layer – paragraph 1.2D

Section 32910 Landfill Topsoil – paragraph 1.3C

The updated specifications are included in the attachments to this letter.

- 8. Appendix F – A backfill specification for the buffer zone soil should be added. As per the ROD, buffer zone soils will need to meet the Unrestricted Use Soil Cleanup Objectives set forth in Table 375-6.8(a) of 6 NYCRR Part 375 for a minimum of two feet in depth measured from the finished surface grade. The remaining buffer zone soils will need to meet, at a minimum, the lower of the protection of groundwater or the protection of public health soil cleanup objectives for commercial use as set forth in Table 375-6.8(b) of 6 NYCRR Part 375.**

The ROD language is added to the appropriate specification sections as listed in the response to comment 7 immediately above.

- 9. Appendix F — Buffer zone erosion control, if needed, should not contain polypropylene (UV degradable or not). Coconut fiber products, or other natural biodegradable products, are acceptable. Please modify the spec. as it relates to buffer zone erosion control.**

Specification Section 31240, Erosion and Sediment Control, Paragraph 2.8, has been modified to remove all polypropylene and now requires 100% biodegradable material that is not harmful to animals. The revised specification section is included in the attachments to this letter.

Sincerely,

Tetra Tech, Inc.



Michael R. Noel, P.G.

Vice President, Principal Hydrogeologist

Encl.